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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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ITW TECH SPRAY, L.L.C.,	ECF CASE
	:
Plaintiff,	Civil Action No. '07-CIV-6676
	:
	Judge Crotty
V.	:
	:
TECH SPRAY MANAGEMENT	<u>DEFENDANTS' INITIAL</u>
COMPANY, L.L.C., RICHARD RUSSELL	<u>DISCLOSURE STATEMENT</u>
AND RITA RUSSELL,	:
	:
Defendants.	:
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Defendants Techspray Management Company, L.L.C., Richard Russell and Rita Russell (collectively, "Defendants") submit the following initial disclosure statement in accordance with Fed. R. Civ. P. 26(1).

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the defendants may use to support their claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Defendants are aware of the following individuals who are likely to know, have or possess discoverable information:

John E. Grimes
Growth Capital Partners, L.P.
2626 Cole Avenue, Suite 240
Dallas, Texas 75209
(214) 303-1177
Sale of Techspray.

Kirsten Makel
Arkema
(215) 419-5381
Techspray's 134a pricing.

Steven Galaton
Agas
(215) 340-7788
134a pricing.

Dan Miller
Gary Swink
Mary Ann Spiegel
Stephen Houseal
Stephen Micatka
Phil Mancuso
ITW/ITWTechspray
Purchase of Techspray.

Bill E. Koskie
15115 Stonewick Dr.
Houston, Texas 77068-2425
(281) 893-2407
Techspray's 134a pricing.

Jimmy Witcher
(806) 382-7616
Sale of Techspray.

Sam Spradlin
(806) 322-2805
Sale of Techspray.

Richard G. Russell
P.O. Box 3036
Carefree, AZ 85377
(480) 595-0512
Sale of Techspray.

B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the defendants and that the defendants may use to support their claims or defenses, unless solely for impeachment.

1. Copies of documents placed in the due diligence data room. (These documents are under the control of Growth Capital Partners.)
2. Copies of financial projections and other financial analyses provided by Techspray to ITW. (These documents are under the control of Growth Capital Parterns or ITW Techspray.)
3. Copies of the Acquisition Agreement and related closing documents.
4. Copies of communications between or among Techspray , Growth Capital Partners and ITW related to the sale. (These documents are under the control of Growth Capital Partners, ITW or ITW Techspray.)

C. A computation of any category of damages claimed by the defendants.

No damages are claimed by the defendants.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

The defendants have no insurance.

DATED this 16th day of October 2007.

SUSMAN GODFREY L.L.P.

By: “/s/”
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CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record, who are deemed to have consented to electronic service are being served this 16th day of October, 2007 with a copy of this document via the Court's CM/ECF system per Local Rule 5.2.

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“/s/”

Vineet Bhatia